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Attorneys for Plaintiff

APR 11 2011

AT 8:30  
WILLIAM T. WALSH  
CLERK

UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF NEW JERSEY

-----X  
DANIEL TRIPO,

Plaintiff,

CIVIL NO.

11-2050 FCW

-against-

**COMPLAINT  
AND JURY DEMAND**

ROBERT WOOD JOHNSON MEDICAL CENTER,  
SYLVIANA BARSOUM, M.D., RENU CHHOKRA,  
M.D., and ARLEEN LAMBA, M.D..

Defendants.  
-----X

Plaintiff, DANIEL TRIPO, residing at 165 Driggs Street,  
Staten Island, NY, complaining of the defendants says:

1. This Court has jurisdiction of this matter under the  
diversity of citizenship and the amount in controversy pursuant to  
28 U.S.C. §1332.

- a. Plaintiff is a citizen of the State of New York.
- b. Defendant, ROBERT WOOD JOHNSON MEDICAL CENTER, is a  
citizen of the State of New Jersey with its  
principal place of business at One Robert Wood  
Johnson Place, New Brunswick, NJ 08901.
- c. Defendant, SYLVIANA BARSOUM, M.D., is a citizen of  
the State of New Jersey and resides at 256 New

Jersey Avenue, Newfield, NJ 08344.

d. Defendant, RENU CHHOKRA, M.D., is a citizen of the State of New Jersey and resides at 34 Tanner Drive, Princeton, NJ 08540.

e. Defendant, ARLEEN LAMBA, M.D., is a citizen of the State of Maryland and resides at 11915 Meadow Vista Way, Clarksville, MD 21029.

f. The amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

2. At all times herein relevant, defendant, ROBERT WOOD JOHNSON MEDICAL CENTER, was a duly accredited hospital authorized by the State of New Jersey to provide hospital services to its patients at all times herein relevant and was governed by the standards promulgated by the authority of the State of New Jersey through its various regulatory agencies, the standards of the Joint Commission on Accreditation of Health Care Organizations and its own internal constitution, by-laws, regulations, protocols, procedures and standards.

3. At all times herein mentioned, defendant, SYLVIANA BARSOUM, M.D., was a licensed and practicing physician in the State of New Jersey holding herself out to the public as a specialist in the field of anesthesiology. As such, DR. BARSOUM is and was to be held to a higher standard of care than the general practitioner within her chosen specialty.

4. At all times herein mentioned, defendant, RENU CHHOKRA,

M.D., was a licensed and practicing physician in the State of New Jersey holding herself out to the public as a specialist in the field of anesthesiology. As such, DR. CHHOKRA is and was to be held to a higher standard of care than the general practitioner within her chosen specialty.

5. At all times herein mentioned, defendant, ARLEEN LAMBA, M.D., was a anesthesia resident working for defendant, ROBERT WOOD JOHNSON MEDICAL CENTER.

6. On January 12, 2010, plaintiff came under the medical care of the defendants for surgery to plaintiff's sternum.

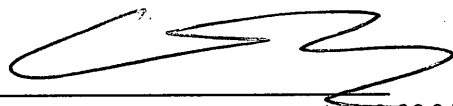
7. Plaintiff charges that defendants, any one or all of them, and their employees and/or agents were negligent, careless, reckless, and departed from good and accepted medical standards in the treatment of plaintiff.

8. As a result of the carelessness, recklessness and negligence as well as the failure to adhere to accepted medical standards by defendants and their employees and/or agents, plaintiff suffered severe and painful injuries and emotional distress.

WHEREFORE, plaintiff demands judgment against the defendants in amount to be determined at trial, together with costs, interest and for such other relief as the Court may deem proper.

Dated: March 9, 2011

AMABILE & ERMAN, P.C.  
Attorney for Plaintiff



ANTHONY A. LENZA, JR. (AL2680)  
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**JURY DEMAND**

Plaintiff hereby demands trial by jury.

Dated: March 9, 2011

AMABILE & ERMAN, P.C.  
Attorney for Plaintiff



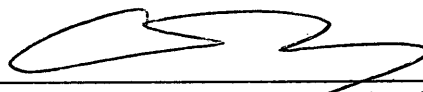
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**CERTIFICATION PURSUANT TO CIV. RULE 11.2**

The undersigned certifies that there are no other pending cases that are related to the within matters in controversy.

Dated: March 9, 2011

AMABILE & ERMAN, P.C.  
Attorney for Plaintiff



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